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Document Processing Center (7407)
Office of Pollution, Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N. W.
Washington, DC 20460
Attention: Section 8(e) Coordinator

Re: **TSCA Section 8(e) Submissions**

Dear Sir/Madam:

3M Company ("3M") requests that EPA place the attached studies in the TSCA Section 8(e) docket. We have included a master index for these studies identifying the study title, test substance and CAS number. A Confidential Business Information (CBI) version of this index and the studies also is being submitted today pursuant to EPA procedures. 3M has not provided CBI substantiation with this submission, but would be willing to do so at the Agency's request.

3M has concluded that data in these studies may not be, strictly speaking, "corroborative" of previously reported or published information as defined in EPA's reporting guidance or otherwise potentially may warrant 8(e) submission based on EPA's reporting guidance.

3M appreciates EPA's attention to this matter. Please contact the undersigned if you have any questions or require further information regarding this submission.

Very truly yours,

Katherine E. Reed (9.02)

Dr. Katherine E. Reed, Ph.D
Staff Vice President
Environmental Technology and Safety
Services
(651) 778-4331
kreed@mmm.com

Master Index to Studies Submitted Under TSCA 8(e) by 3M Company on September 24, 2004
(Confidential Business Information Redacted)

Title	Substance Information	CAS Information
Primary Eye Irritation Study - Rabbits	[20% solids (Ethomeen S/12 1.0M with diethyl sulfate 0.94M); 80% water [Ethomeen S/12 = R-N(Et) ₂ +(C ₂ H ₄ OH) ₂ where R=C ₁₈ with 1-2 double bonds]	[20% (61791-24-0 with 64-67-5); 80% 7732-18-5
Guinea Pig Contact Dermal Irritation/Sensitization Primary Eye Irritation Study - Rabbits	Butanoic acid, heptafluoro-, calcium salt	2366-98-5
Acute Oral Toxicity Screen with T- 2712CoC in Albino Rabbits	perfluorohexanoic acid	307-24-4
Primary Skin Irritation Test with T- 2725Ec (Repeat Application) in Albino Rabbits	[[[[[[1 1 1 1 1 1	[[[[[[1 1 1 1 1 1
Acute Ocular Irritation Test with T- 2725Ec in Albino Rabbits	[[[[[[1 1 1 1 1 1	[[[[[[1 1 1 1 1 1
Sensitization Study with T-2741AC in Albino Guinea Pigs	[[[[[[1 1 1 1 1 1	[[[[[[1 1 1 1 1 1
Oral Rangefinder Study of T-3140BS in Pregnant Rats	1-[3'-(perfluorooctanesulfonate) anilino amide]-2-potassium 3,4,5,6-tetrachlorophthalate 80% 1-[3'-(perfluorooctanesulfonate) anilino amide]-2-potassium 3,4,5,6-tetrachlorophthalate; 5% C4 homolog; 5% C5 homolog; 5% C6 homolog; 5% C7 homolog; 5% C5 homolog; 5% C4 homolog; 5% C6 homolog	57589-85-2 80% 57589-85-2; 5% 68541-01-5; 5% 68541-02-6; 5% 68568-54-7; 5% 68815-72-5
Oral Rangefinder Study of T-3139BS in Pregnant Rats	2997CoC in Albino Rabbits	
Acute Ocular Irritation Test with T- 2997CoC in Albino Rabbits	amine salt	
Sensitization Study with T-3386 in Albino Guinea Pigs	[[[[[[1 1 1 1 1 1	[[[[[[1 1 1 1 1 1
In Vitro Microbiological Mutagenicity Assays of 3M Company's Compound T-3411	[[[[[[1 1 1 1 1 1	[[[[[[1 1 1 1 1 1

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Title	Substance Information	CAS Information
Acute Oral Toxicity Screen with T-3448 in Albino Rats	[ethyl]([heptanedecafluoroocetyl)sulfonyl]amino]ethyl-omega-hydroxy-, 12% polyethylene glycol; 7% water; 4.86% poly(oxy-1,2-ethanediyl), alpha-[2-[ethyl]([pentadecafluoroheptylsulfonyl]amino)ethyl-omega-hydroxy-, 4% residual organic fluorocarbon; 3% heptadecafluoro-1-octanesulfonic acid; 0.81% poly(oxy-1,2-ethanediyl), alpha-[2-[ethyl]([undecafluoropentyl)sulfonyl]amino]ethyl-omega-hydroxy-, 0.3% 1,4-dioxane; 0.2% n-ethylperfluorooctanesulfonamidoethyl alcohol; 0.03% linear n-ethylperfluoroctanesulfonamide	68% 29117-08-6; 12% 25322-68-3; 7% 7732-18-5; 4.86% 56372-23-7; 4.05% 68298-79-3; 3.24% 68298-81-7; 3% 1763-23-1; 0.81% 68298-80-6; 0.3% 123-91-1; 0.2% 1691-99-2; 0.03% 4151-50-2
In Vitro Microbiological Mutagenicity Assays of 3M Company's Compound T-3516	[[]
Acute Dermal Toxicity Study with T-3451 in Albino Rabbits	C8F17SO2N(CH3).Na	Unknown
Acute Oral Toxicity - Method, Summary, Pathology: Primary Dermal Irritation - Method, Summary, Primary Eye Irritation - Method, Summary; Guinea Pig Maximization - Method, Summary	[]	[]
Acute Oral Toxicity - Method, Summary, Pathology: Primary Dermal Irritation - Method, Summary, Primary Eye Irritation - Method, Summary	[]	[]
Dermal Sensitization Study in Guinea Pigs, Maximization Test - Method, Summary	[]	[]
4 Hour Acute Aerosol Inhalation Toxicity Study with T-3825 in Rats Primary Eye Irritation/Corrosion Study in Rabbits	[]	[]
4-Hour Acute Aerosol Inhalation Toxicity Study with T-3825 in Rats	[]	[]

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Title	Substance Information	CAS Information
T-3820: Acute Inhalation Toxicity Test	[] 1	[] 1
T-3821: Acute Inhalation Toxicity Test	[] 1	[] 1
T-3845 Acute Inhalation Toxicity Test	heptafluorobutyl chloride	375-16-6
Evaluation of the Acute Inhalation Toxicity of T-3920 in the Rat	[] 1	[] 1
Primary Eye Irritation Study in Rabbits - Method, Summary		
Acute Oral Toxicity Study in Rats (OECD Guidelines)	Decanoic acid, nonadecafluoro-, ammonium salt 95% ammonium perfluorodecanoate; 5% ammonium perfluorooctanoate	3108-42-7 5% 3825-26-1
Acute Inhalation Toxicity Study with T-4129 in the Rat	[] 1	[] 1
Acute Inhalation Toxicity Study with T-4130 in the Rat	[] 1	[] 1
Acute Oral Toxicity Study in Rats; Acute Dermal Irritation Study in Rabbits; Acute Eye Irritation Study in Rabbits	[] 1	[] 1
Dermal Sensitization Study in Guinea Pigs - Maximization Test	[] 1	[] 1
Mutagenicity Test on T-4413 FX - 1355 in the L5178Y TK+/- Mouse Lymphoma Forward Mutation Assay with Duplicate Cultures	[] 1	[] 1
Acute Inhalation Toxicity Study with T-4354 in the Rat	[] 1	[] 1
Primary Dermal Irritation/Corrosion Study in Rabbits	[] 1	[] 1
Acute Inhalation Toxicity Study in the Rat with T-4397	[] 1	[] 1
Primary Eye Irritation/Corrosion Study of T-5261 in Rabbits	lithium tetrafluoroethane-1,2-disulfonimide	Unknown
Acute Inhalation Toxicity Evaluation on T-5231 in Rats	[] 1	[] 1
4-Hour, Acute Inhalation Toxicity Study with T-5305 in Rats	[] 1	[] 1
4-Hour, Acute Inhalation Toxicity Study (Limit Test) with T-5343.1 in Rats	[] 1	[] 1
4-Hour, Acute Inhalation Toxicity Study With T-5306 in Rats	[] 1	[] 1

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Title	Substance Information	CAS Information
4-Hour, Acute Inhalation Toxicity Study (Limit Test) with T-5357-1	[]	[]
Acute Dermal Toxicity Study of T-4201 in Rabbits	Lithium Bis(Trifluoromethanesulfonyl)imide	90076-65-6
SubAcute 28-Day Oral Toxicity with T-2816 by Daily Gavage in the Rat Followed by a 14 Day Recovery Period	[]	[]
Subacute 28-Day Oral Toxicity with T-2816 by Daily Gavage in the Rat Followed by a 14-Day Recovery Period	[]	[]
Acute Inhalation Toxicity Evaluation on T-5187 in Rats	[]	[]
T-4240 4-Week Oral Toxicity Study in Rats	[]	[]
Dermal Sensitization Study of T-5473 in Guinea Pigs - Maximization Test	[]	[]
4-Hour, Acute Inhalation Toxicity Study With T-5698 in Rats	[]	[]
Acute Inhalation Toxicity Evaluation On T-5708 in Rats	[]	[]
T-5486 Assessment of Cardiac Sensitization Potential in Dogs	octafluoropropane	76-19-7
Acute Inhalation Toxicity Evaluation on T-5655 in Rats	[]	[]
T-4201 4 Week Oral Toxicity Study in Rats with 2-Week Recovery Period	Lithium Bis(Trifluoromethanesulfonyl)imide	90076-65-6
T-5658: Eye Irritation to the Rabbit	[]	[]
Acute Inhalation Toxicity Evaluation on T-5715 in Rats	[]	[]
Acute Inhalation Toxicity Evaluation on T-5716 in Rats	[]	[]
Acute Inhalation Toxicity Study of T-5724 in Rats	[]	[]
Acute Inhalation Toxicity Study of T-5725 (Resin Solution) in Rats	[]	[]
Acute Inhalation Toxicity Study (Limit Test) of T-5927 in Rats	[]	[]
Acute Inhalation Toxicity Study of T-5928 in Rats (LCC50)	[]	[]

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Title	Substance Information	CAS Information
Acute Inhalation Toxicity Evaluation on T-5829 in Rats	[]	[]
Single-Dose Intravenous Pharmacokinetic Study of T-5963 in Rabbits	[]	[]
Single-Dose Intravenous Pharmacokinetic Study of T-6030 in Rabbits	[]	[]
5-Daily Dose Dermal Absorption/Toxicity Study of T-6029 and T-6032 in Rabbits	87-93% fluorinated alkyl alkoxylates; 4-10% linear N-ethyl perfluorooctanesulfonamide; 2-4% poly(oxy-1,2-ethanediyl), alpha-[2-[ethyl]([pentadecafluoroheptylsulfonyl]amino)ethyl]-omega,-methoxy-, 0-4% residual organic fluorocompounds; 0-2% c8 sulfonamide; 0.1-1% 1-heptanesulfonamide; N-ethyl-1,1,2,2,3,3,4,4,5,5,6,6,7,7-pentadecafluoro-miscellaneous components (each less than 1%)	68958-60-1; 0-2% 31506-32-8; 0.1-1% 68957-62-0
Single-Dose Intravenous Pharmacokinetic Study of T-6061 in Rabbits	[]	[]
Single-Dose Intravenous Pharmacokinetic Study of T-6065 in Rabbits	[]	[]
Single Dose Intravenous Pharmacokinetic Study of T-6063 in Rabbits	[]	[]
Acute Inhalation Toxicity Study of T-6235 in Rats	[]	[]
Primary Dermal Irritation/Corrosion Study of T-6402 in Rabbits	[]	[]
Dermal Sensitization Study of T-6402 in Guinea Pigs- Maximization Test (EC Guidelines)	[]	[]
Acute Eye Irritation/Corrosion Study with T-6318 in the Rabbit	1-Butanesulfonic acid, 1,1,2,2,3,3,4,4,4-nonafluoro-, Sodium Salt	102061-82-5
Primary Skin Irritation / Corrosion Study with T-6567 in the Rabbit (4-Hour Semi-Occlusive Application)	[]	[]

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Title	Substance Information	CAS Information
Assessment of Contact Hypersensitivity to T-6318 in the Albino Guinea Pig (Maximization Test)	1-Butanesulfonic acid, 1,1,2,2,3,3,4,4,4-nonafluoro-, Sodium Salt	102061-82-5
Single-Dose Intravenous Pharmacokinetic Study of T-6502 in Rabbits	[]	[]
Single-Dose Intravenous Pharmacokinetic Study of T-6504 in Rabbits	[]	[]
Single Dose Intravenous Pharmacokinetic Study of T-6506 in Rabbits	[]	[]
A Study for Effect on Embryofetal Development of the Rat (Inhalation Administration)	20-80% methyl nonafluorobutyl ether; 20-80% methyl nonfluorobutylether	20-80% 163702-08-7; 20-80% 163702-07-6
Bacterial Reverse Mutation Test of T-6695	[]	[]
5-day Inhalation Toxicity of Perfluorocyclohexene (C6F10; T-6878) in Rats	70% crude perfluorocyclohexene; 30% perfluoromethylcyclopentene	70% 355-75-9
5-Daily Dose Dermal Absorption/Toxicity Study of T-6502 and T-6503 in Rabbits	[]	[]
Primary Eye Irritation/Corrosion Study of T-6786 in Rabbits	Lithium Bis(perfluoroethylsulfonyl)imide	132843-44-8
Primary Dermal Irritation/Corrosion Study of T-6804 in Rabbits	Lithium Bis(perfluoroethylsulfonyl)imide	132843-44-8
5-Day Inhalation Toxicity Screen of HFE []	c-C6F11OCH ₃	4943-08-2
Primary Eye Irritation/Corrosion Study of T-6804 in a Rabbit (OECD Guidelines)	Lithium Bis(perfluoroethylsulfonyl)imide	132843-44-8
Acute Oral Toxicity Study of T-6804 in Rats (OECD Guidelines)	Lithium Bis(perfluoroethylsulfonyl)imide	132843-44-8
Dermal Sensitization Study of T-6908 in Guinea Pigs, Maximization Test (EC Guidelines)	N-Me Fos Amide-Triphenylbenzyl Phosphonium Chloride Complex; D-1624	31506-32-8
Eye Irritation/Corrosion Study of T-4127 in the Rabbit		

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Title	Substance Information	CAS Information
Single-Dose Intravenous Pharmacokinetic Study of T-6924 in Rabbits	[]	[]
Dermal Sensitization Study of T-6924 in Guinea Pigs- Maximization Test (EC Guidelines)	[]	[]
Dermal Sensitization Study of T-7003 in Guinea Pigs - Maximization Test (EC Guidelines)	[]	[]
Report of Sera and Liver Data for [] Monoester - Preliminary ADME Study in Rats	[]	[]
[] Diester-Pharmacokinetic Study in Rats (Study No. T-7043.1, DT-26)	N-ethyl heptadecafluoro-N[2-(phosphonoxy)ethyl] octanesulfonamide ammonium bis[ethyl(perfluorooctane)sulfonate]phosphate	67969-69-1
Single Dose Intravenous Pharmacokinetic Study with T-7082 in Rabbits	[]	[]
[] Monoester - Pharmacokinetic Study in Rats (Study No. T-6997.2)	N-ethyl heptafluoro-N[2-(phosphonoxy)ethyl] octanesulfonamide diammonium salt	67969-69-1
Determination of PFOS Presence and Concentration in Serum from the Dermal Absorption Studies of T-7106 and T-7107 in Hra.(NZW)SPF Rabbits	[]	[]
Dermal Sensitization Study of T-7285.5 in Guinea Pigs - Maximization Test (EPA/OECD Guidelines)	[]	[]
Twenty-eight Day Repeated-Dose Oral Toxicity Study of T-6861 in Rats	Lithium Bis(perfluoroethylsulfonyl)imide	132843-44-8
Twenty-eight Day Repeated Dose Oral Toxicity Study of T-7005 in Rats	[]	[]
Acute (4-Hour) Inhalation Toxicity of Test Atmospheres Obtained after Heating L-14990 15% masterbatch in PP, L-14990-LD or Polypropylene in Rats	[]	[]

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Title	Substance Information	CAS Information
Toxicokinetic Study of Perfluorooctanesulfonamidoacetate (M556; T-7071.2) in Rats	perfluorooctanesulfonamido carboxylic acid	2806-24-8
Acute Nose-Only Inhalation Toxicity Study of T-7087, T-7088, T-7089 and T-7090 in Rats (Limit Test)	[] [] [] []	[] [] [] []
Acute Ocular Irritation Study of T-7485 Applied to New Zealand White Rabbits	potassium nonafluorobutanesulfonate	29420-49-3
Toxicokinetic Study of Perfluorooctane Sulfonamide (PFOSA; T-7132.2) in Rats	perfluorooctanesulfonamide	754-91-6
Acute Four-Hour Inhalation Study in Rats	Perfluorobutanesulfonyl Fluoride (96-98%) And Perfluorosulfolane (2-4%)	96-98% 375-72-4; 2-4% 42060-64-0
Primary Eye Irritation/Corrosion Study of T-7508.2 in Rabbits	[] [] [] []	[] [] [] []
MV31 K-Salz; Test for Primary Dermal Irritation in the Rabbit	[] [] [] []	[] [] [] []
Assessment of Acute Oral Toxicity with T-7560 In The Rat (Acute Toxic Class Method)	[] [] [] []	[] [] [] []
Acute Eye Irritation/Corrosion Study with T-7560 in the Rabbit	[] [] [] []	[] [] [] []
[] Potassium bis-(perfluorobutanesulfonyl)imide	Potassium bis(perfluorobutanesulfonyl)imide	129135-87-1
Repeat Dose ADME Study in Rats	Potassium bis(perfluorobutanesulfonyl)imide	129135-87-1
Toxicity Study by Repeat Dose Inhalation Administration to CD Rats for 4 Weeks	Perfluorobutanesulfonyl Fluoride (96-98%) And Perfluorosulfolane (2-4%)	96-98% 375-72-4; 2-4% 42060-64-0
A Sub-acute(28 Day) Inhalation Toxicity Study, Including a Recovery Study, with T-7479 in Rats	1,1,1,2,2,4,5,5,5-nonafluoro-4-(trifluoromethyl)-3-pentanone	756-13-8
Xenochemical Receptor trans-Activation by Perfluorooctane-based Chemicals	perfluorooctanesulfonamide	754-91-6

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Title	Substance Information	CAS Information
Acute Inhalation Toxicokinetic Study of Perfluorooctanesulfonyl Fluoride (POSF) T-7098.4	perfluorooctanesulfonyl fluoride	307-35-7
Five-Day Inhalation Toxicity Study of HFE [] in Male CD Rats	c-C6F11-CF2-O-CH3	181214-67-5
Acute Toxicity Screen of Perfluorocyclohexene (T-6878) in Rats [] (T-7056)	70% crude perfluorocyclohexene; 30% perfluoromethylcyclopentene	70% 355-75-9
Assessment of Acute Oral Toxicity with T-7601.3 in the Rat (Acute Toxic Class Method)	N-Methyl Perfluorobutylsulfonamide = 95% 1-Butanesulfonamide, 1,1,2,2,3,3,4,4,4-Nonfluoro-n-Methyl; 5% N-Methyl-4-Hydro-Perfluorobutylsulfonamide	68298-12-4
Subchronic 90-Day Oral Toxicity Study with T-7320 By Daily Gavage in the Rat Followed by a 28-Day Recovery Period	[] [] []	[] [] []
Protein Binding of Perfluorobutane Sulfonate, Perfluorohexane Sulfonate, Perfluorooctane Sulfonate and Perfluorooctanoate to Plasma (Human, Rat, and Monkey), and Various Human-Derived Plasma Protein Fractions	84% 1-octanesulfonic acid, 1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-heptadecafluoro-, potassium salt; 5.5% potassium (perfluorohexyl)sulfonate; 4% potassium nonafluorobutanesulfonate; 4% potassium perfluoropentanesulfonate; 2% potassium perfluoropentanesulfonate; 0.5% unknown	84% 2795-39-3; 5.5% 3871-99-6; 4% 29420-49-3; 4% 60270-55-5; 2% 3872-25-1
	potassium nonafluorobutanesulfonate	29420-49-3
	potassium (perfluorohexyl)sulfonate	3871-99-6
	potassium perfluorooctanoate	2395-00-8

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Title	Substance Information	CAS Information
Five Day Inhalation Toxicity Study of [] Monochloride, [], and HCFC225cb in Male CD Rats	C4F9-OCH ₂ Cl C-C ₆ F ₁₁ -CF ₂ -O-CH ₃ CF ₂ C(CF ₃)CHClF	205367-42-6 (n-isomer) and 221617-86-3 (l-isomer) 181214-67-5 507-55-1
Toxicokinetic Screen of [] (T-7483) in Rats	(T-C ₇ F ₁₅ C(O)N(H)CH ₃	89685-56-3
Low Level Oral Perfluorooctanesulfonate (PFOS) Dose Toxicokinetic Study in Rats: Serum and Liver PFOS	84% 1-octanesulfonic acid, 1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-heptadecafluoro-, potassium salt; 5.5% potassium (perfluorohexyl)sulfonate; 4% potassium nonafluorobutanesulfonate; 4% potassium perfluorohexanesulfonate; 2% potassium perfluoropentanesulfonate; 0.5% unknown	84% 2795-39-3; 5.5% 3871-99-6; 4% 29420-49-3; 4% 60270-55-5; 2% 3872-25-1

October 26, 2004



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Document Processing Center (7407)
Office of Pollution, Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N. W.
Washington, DC 20460
Attention: Section 8(e) Coordinator

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U.S. ENVIRONMENTAL PROTECTION AGENCY
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Re: **TSCA Section 8(e) Submissions**

Dear Sir/Madam:

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3M has concluded that data in these studies may not be, strictly speaking, "corroborative" of previously reported or published information as defined in EPA's reporting guidance or otherwise potentially may warrant 8(e) submission based on EPA's reporting guidance.

3M appreciates EPA's attention to this matter. Please contact the undersigned if you have any questions or require further information regarding this submission.

Very truly yours,

Katherine E. Reed (9.7.)

Dr. Katherine E. Reed, Ph.D
Staff Vice President
Environmental Technology and Safety
Services
(651) 778-4331
kereed@mmm.com

Master Index to Studies Submitted Under TSCA 8(e) by 3M Company on October 26, 2004
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Title	Substance Information	CAS Information
Aquatic Toxicity Data Sheet: 48hr <i>Daphnia Magna</i>	1,4-dioxane; heptadecafluoro-1-octanesulfonic acid; linear n-ethyl perfluoroctanesulfonamide; n-ethyl/perfluoroctanesulfonamidoethyl alcohol; poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl][heptadecafluoroocetyl]sulfonyl]aminoethyl]-.omega.-hydroxy-; poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl][nonafluorobutyl]sulfonyl]aminoethyl]-.omega.-hydroxy-; poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl][pentadecafluoroheptyl]sulfonyl]aminoethyl]-.omega.-hydroxy-; poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl][tridecafluorohexy]sulfonyl]aminoethyl]-.omega.-hydroxy-; poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl][undecafluoropenty]sulfonyl]aminoethyl]-.omega.-hydroxy-; polyethylene glycol; water	1,4-dioxane (123-91-1); heptadecafluoro-1-octanesulfonic acid (1763-23-1); linear n-ethyl perfluoroctanesulfonamide (4151-50-2); n-ethylperfluoroctanesulfonamidoethyl alcohol (1691-99-2); poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl][heptadecafluoroocetyl]sulfonyl]aminoethyl]-.omega.-hydroxy- (29117-08-6); poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl][nonafluorobutyl]sulfonyl]aminoethyl]-.omega.-hydroxy- (68298-79-3); poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl][pentadecafluoroheptyl]sulfonyl]aminoethyl]-.omega.-hydroxy- (68298-81-7); poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl][tridecafluorohexy]sulfonyl]aminoethyl]-.omega.-hydroxy- (56372-23-7); poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl][undecafluoropenty]sulfonyl]aminoethyl]-.omega.-hydroxy- (68298-80-6); polyethylene glycol (25322-68-3); water (7732-18-5)
Multigeneration Daphnid Life Cycle Test	1,4-dioxane; heptadecafluoro-1-octanesulfonic acid; linear n-ethyl perfluoroctanesulfonamide; n-ethyl/perfluoroctanesulfonamidoethyl alcohol; poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl][heptadecafluoroocetyl]sulfonyl]aminoethyl]-.omega.-hydroxy-; poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl][nonafluorobutyl]sulfonyl]aminoethyl]-.omega.-hydroxy-; poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl][pentadecafluoroheptyl]sulfonyl]aminoethyl]-.omega.-hydroxy-; poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl][tridecafluorohexy]sulfonyl]aminoethyl]-.omega.-hydroxy-; poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl][undecafluoropenty]sulfonyl]aminoethyl]-.omega.-hydroxy-; polyethylene glycol; water	1,4-dioxane (123-91-1); heptadecafluoro-1-octanesulfonic acid (1763-23-1); linear n-ethyl perfluoroctanesulfonamide (4151-50-2); n-ethylperfluoroctanesulfonamidoethyl alcohol (1691-99-2); poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl][heptadecafluoroocetyl]sulfonyl]aminoethyl]-.omega.-hydroxy- (29117-08-6); poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl][nonafluorobutyl]sulfonyl]aminoethyl]-.omega.-hydroxy- (68298-79-3); poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl][pentadecafluoroheptyl]sulfonyl]aminoethyl]-.omega.-hydroxy- (68298-81-7); poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl][tridecafluorohexy]sulfonyl]aminoethyl]-.omega.-hydroxy- (56372-23-7); poly(oxy-1,2-ethanediyl), .alpha.-[2-[ethyl][undecafluoropenty]sulfonyl]aminoethyl]-.omega.-hydroxy- (68298-80-6); polyethylene glycol (25322-68-3); water (7732-18-5)
Aquatic Invertebrate Testing - Alkytins LR 8024-1	Alkytins: dibutyltin laurate and dibutyltin-di(2 ethylhexoate)	Dibutyltin laurate (CAS 77-58-7); Dibutyltin-di(2 ethylhexoate) (CAS 2781-10-4)
Aquatic Invertebrate Testing - Decosheen Material (LR-8052)	Decosheen Ribbon Materials and pigments: Decosheen Blue in Green Ceres Blue ZV; Decosheen Gold Paste Pigment; Decosheen Royal Blue, Solvent Blue	Decosheen Blue in Green Ceres Blue ZV (CAS 61814-09-3); Decosheen Royal Blue, Solvent Blue (CAS 1325-86-6); Decosheen Gold Paste Pigment (CAS Number Unavailable)
R Scratch Remover (Fathead Minnow)	55-65% Water; 20-30% Stoddard Solvent; 1-5% Sodium Silicate; 1-5% Potassium Hydroxide; 0.1-3% Nonylphenoxypoly(oxyethylene)ethanol	Water (CAS 7732-18-5); Stoddard Solvent (CAS 8052-41-3); Sodium Silicate (CAS 1344-09-8); Potassium Hydroxide (CAS 1310-58-3); Nonylphenoxypoly(oxyethylene)ethanol (CAS 9016-45-9)
S Scratch Remover (Fathead Minnow)	60-70% Water; 20-30% Stoddard Solvent; 1-5% Sodium Silicate; 0.1-3% Turgitol NP-33	Water (CAS 7732-18-5); Stoddard Solvent (CAS 8052-41-3); Sodium Silicate (CAS 1344-09-8); Turgitol NP-33 (CAS 9016-45-9)

Master Index to Studies Submitted Under TSCA 8(e) by 3M Company on October 26, 2004
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Title	Substance Information	CAS Information
Octanol Water Partition Coefficient CoCl ₂ .6H ₂ O as Co ²⁺ Toxicity to Microtox Reagent	N-methylperfluoroocane sulfonamidoethanol Cobalt (as Co ²⁺ ion) (CoCl ₂ .6H ₂ O)	CAS 24448-09-7 CAS 7791-13-1
Activated Sludge Respiration Inhibition Test on CoCl ₂ .6H ₂ O as Co ion	Cobalt (as Co ²⁺ ion) (CoCl ₂ .6H ₂ O)	CAS 7791-13-1
Acute Toxicity of CoCl ₂ .6H ₂ O as Co ion to Daphnia magna under Static Exposure Conditions	Cobalt (as Co ²⁺ ion) (CoCl ₂ .6H ₂ O)	CAS 7791-13-1
Acute Toxicity of CoCl ₂ .6H ₂ O as Co ion to Fathead Minnow under Static Exposure Conditions	Cobalt (as Co ²⁺ ion) (CoCl ₂ .6H ₂ O)	CAS 7791-13-1
Freshwater Algae Growth Inhibition Test		
Daphnia magna 21-Day Chronic Reproduction Study	N-ethylperfluoroocane sulfonamidoethanol	CAS 1691-99-2
Plant Growth Effects of []	[]	[]
Final Report (Daphnia and Microtox) Microtox Test Results	Monomethyl ether of hydroquinone 2 Ethylhexyl Acrylate; Isooctyl Acrylate Monomer; 2-Methylbutyl acrylate; Methyl isoamyl acrylate; Isooctyl Acrylate (CAS 29590-42-9); 2-Methylbutyl acrylate (CAS 44914-03-6); Methyl isoamyl acrylate (CAS 18993-92-1); Isooctyl Acrylate (CAS 29590-42-9)	CAS 150-76-5 2 Ethylhexyl Acrylate (CAS 103-11-7); Isooctyl Acrylate Monomer (CAS 29590-42-9); 2-Methylbutyl acrylate (CAS 44914-03-6); Methyl isoamyl acrylate (CAS 18993-92-1); Isooctyl Acrylate (CAS 29590-42-9)
Phytotoxicity Test Results	[]	[]

Master Index to Studies Submitted Under TSCA 8(e) by 3M Company on October 26, 2004
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Title	Substance Information	CAS Information
Plant Toxicity Comparison, Young Seedling [Growth	[1]	[1]
<i>Ceriodaphnia dubia</i> Survival and Reproduction exposed to Opequon Creek Water Spiked with BETZ 1110 Polymer (November 4, 1987 sample) for seven days under static renewal conditions	BETZ 1110: Non-3M Product - Chemical composition not provided to 3M by manufacturer	MSDS provided by manufacturer states product is "not hazardous" and not "considered to be a carcinogen"
<i>Ceriodaphnia dubia</i> Survival and Reproduction exposed to Opequon Creek Water Spiked with Betz 1138 Polymer (November 4, 1987 sample) for seven days under static renewal conditions	BETZ 1138: Non-3M Product - Chemical composition not provided to 3M by manufacturer	MSDS provided by manufacturer states product is "not hazardous" and not "considered to be a carcinogen"
Toxicity of 1,6 - Hexanediol Diacrylate to <i>Daphnia magna</i>	1,6 Hexanediol diacrylate	CAS 13048-33-4
<i>Daphnia magna</i> Chronic Bioassay Under Static Renewal Conditions	Methyl isoamyl acrylate	CAS 18993-92-1
Estimating the Chronic Toxicity of Nalclear 7177 to <i>Ceriodaphnia</i> Survival and Reproduction Using Short-Term Tests	Nalclear 7177 wastewater treatment acrylamide/acrylate polymer - Chemical composition not provided to 3M by manufacturer	CAS Information not provided to 3M by manufacturer
Acute Toxicity of Isooctyl Acrylate to <i>Daphnia magna</i>	Isooctyl Acrylate Monomer	CAS 29590-42-9
Static Acute Toxicity of [] to the <i>Daphnid, Daphnia magna</i>	Tolytriazole	CAS 29385-43-1
Static Acute Toxicity of [] to the Alga, <i>Selenastrum capricornutum</i>	Tolytriazole	CAS 29385-43-1
Static Acute Toxicity of [] to the <i>Daphnid, Daphnia magna</i>	[1]	[1]
Microtox Test Results	Tolytriazole	CAS 29385-43-1

Master Index to Studies Submitted Under TSCA 8(e) by 3M Company on October 26, 2004
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Title	Substance Information	CAS Information
Static Acute Toxicity of [] to the Fathead Minnow, <i>Pimephales promelas</i>	[]	[]
Static Acute Toxicity of [] to the Daphnid, <i>Daphnia magna</i>	water; propylene-tetrafluoroethylene polymer; tert-butyl alcohol	water (7732-18-5); propylene-tetrafluoroethylene polymer (27029-05-6); tert-butyl alcohol (75-65-0)
Isooctyl acrylate: Fish, Acute Toxicity Test	Isooctyl Acrylate Monomer	CAS 29590-42-9
Isooctyl Acrylate: <i>Daphnia</i> sp. Acute Immobilization Test	Isooctyl Acrylate Monomer	CAS 29590-42-9
Isooctyl Acrylate: Alga, Growth Inhibition Test	Isooctyl Acrylate Monomer	CAS 29590-42-9
Isooctyl Acrylate: <i>Daphnia</i> sp. Reproduction Test	Isooctyl Acrylate Monomer	CAS 29590-42-9
Acute Toxicity of [] to the mysid, <i>Mysisdopsis bahia</i>	[]	[]
Final Report (Microtox)	[]	[]
Determination of the Partition Coefficient (N-N methyl perfluorooctane sulfonamido ethanol; N-methyl perfluorooctane sulfonamidoethyl acrylate Octanol/Water) of T-5896 by High Performance Liquid Chromatography (HPLC)		N-methyl perfluorooctane sulfonamido ethanol (CAS 25268-77-3); N-methyl perfluorooctane sulfonamidoethyl acrylate (CAS 24448-09-7)
OECD Activated Sludge Respiration Inhibition Test Results	N-Dodecyltrimethylammonium chloride	CAS = 112-00-5
Final Report (Fish Acute Toxicity)	Mirataine CB (30% Cocamidopropyl betaine = Amides, coco, N-(3-(dimethylamino)propyl), alkylation products with chloroacetic acid, sodium salts, 70% Water and Inerts); Mirataine COB (30% Coco/Oleamidopropyl Betaine = 1-Propanaminium, 3-amino-N-(carboxymethyl)-N,N-dimethyl-, N-coco acyl derivs., inner salt)	Cocamidopropyl betaine (CAS 70851-07-9); Coco/Oleamidopropyl Betaine (CAS 61789-40-0)
A Flow-Through Life-Cycle Toxicity Test With the Saltwater Mysid (<i>Mysisdopsis bahia</i>)	Perfluorooctane sulfonate	CAS 1763-23-1
Lithium: Alga, Acute toxicity Tests	Lithium Chloride	CAS 7447-41-8

Master Index to Studies Submitted Under TSCA 8(e) by 3M Company on October 26, 2004
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Title	Substance Information	CAS Information
An Early Life-Stage Toxicity Test With the Fathead Minnow (<i>Pimephales promelas</i>)	Perfluoroctane sulfonate	CAS 1763-23-1
Lithium: Fish, Acute toxicity Tests	Lithium Chloride	CAS 7447-41-8
Lithium: <i>Daphnia</i> , Acute toxicity Tests	Lithium Chloride	CAS 7447-41-8
Summary of Toxicity Testing on OSC1 and OSF	Octane sulfonyl chloride and Octane sulfonyl fluoride (CAS 4063-63-5)	Octane sulfonyl fluoride (CAS 7795-95-1), Octane sulfonyl chloride (CAS 4063-63-5)
Toxicity to Microtox Test	Lauryldimethylaminooxide	CAS 1643-20-5

4PP
Larry R. Zobel, MD MPH
Sr. Vice President
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3M Medical Department

8EHQ-1105-00374

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November 16, 2005

8EHQ-80-374

No CBI

Re: TSCA Section 8(e) Supplemental Submissions:
Docket Nos. 8EHQ-1180-373 and 8EHQ-1180-374

Dear Sir/Madam:

CONTAINS NO CBI

3M has previously submitted analytical results for serum measurements of various fluorochemicals. As a supplement to those submissions, 3M provides additional results as described below.

Two female fluorochemical plant workers provided 3M with serum samples for their children through their private physicians and requested that 3M analyze the samples. A total of three children were sampled, one time each. To the best of 3M's understanding, the children were approximately 8 months, ten months and two years of age at the time of sampling. At the time, the workers participated in 3M's occupational medical surveillance program for fluorochemicals. This program does not include children. The sampling was done at the request of the mothers.

Worker #1 had one child sampled, in the fall of 2000, when the child was about 10 months old. The mother's blood was sampled in the fall of 1998, and again in 2000, several months after the baby's birth, as part of the regularly scheduled occupational monitoring. Thus, the maternal levels are provided here to offer some context, but they do not represent immediate pre-pregnancy, gestational, or immediate post-partum levels.

Worker #2 has two children. Child A was also sampled in the fall of 2000, at approximately age 2. The sample from 2000 was re-analyzed with improved analytical techniques in 2002. Child B was about 8 months old when sampled in the fall of 2002. Maternal values are available from the fall of 1998, March 2000, and June 2002, and as with worker #1, are provided to offer general context.

Sampling results are shown in the tables below. For results below the Lower Limit of Quantification (LLOQ) of the analytical method, the quantification limit for the chemical (where available) is shown in parenthesis.

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WORKER #1 CHILD
(Approximately 10 months old when sample collected in Fall 2000)

ANALYTE	RESULTS (ppm)
Perfluorooctanesulfonate (PFOS)	Less than LLOQ (0.040)
Perfluorooctanoate (PFOA)	0.055
Perfluorohexanesulfonate (PFHS)	0.011
N-ethyl perfluorooctanesulfonamidoacetate (PFOSAA)	0.008
N-methyl perfluorooctanesulfonamidoacetate (M570)	0.007
Perfluorooctanesulfonamide (PFOSA)	Less than LLOQ (0.001)
Perfluorooctanesulfonamidoacetate (M556)	Less than LLOQ (0.004)

WORKER #1

ANALYTE	RESULTS (ppm)	
	Nov. 1998 Sample	March 2000 Sample
Perfluorooctanesulfonate (PFOS)	0.146	0.117
Perfluorooctanoate (PFOA)	0.069	0.338
Perfluorohexanesulfonate (PFHS)	0.026	0.026
N-ethyl perfluorooctanesulfonamidoacetate (PFOSAA)	0.018	0.008
N-methyl perfluorooctanesulfonamidoacetate (M570)	0.032	0.029
Perfluorooctanesulfonamide (PFOSA)	Below LLOQ	Below LLOQ (0.001)
Perfluorooctanesulfonamidoacetate (M556)	0.004	0.013

WORKER #2 CHILD A
(Approximately 2 years old when sample collected in Fall 2000)

ANALYTE	RESULTS (ppm)	
	2000 Method	Reanalysis of 2000 Sampling with 2002 Method
Perfluorooctanesulfonate (PFOS)	0.171	0.183
Perfluorooctanoate (PFOA)	0.195	0.138
Perfluorohexanesulfonate (PFHS)	0.064	0.054
N-ethyl perfluorooctanesulfonamidoacetate (PFOSAA)	Below LLOQ (0.006)	0.005
N-methyl perfluorooctanesulfonamidoacetate (M570)	0.009	0.007
Perfluorooctanesulfonamide (PFOSA)	Below LLOQ (0.001)	n/a
Perfluorooctanesulfonamidoacetate (M556)	0.008	n/a

WORKER #2 CHILD B
(Approximately 8 months old when sample collected in Fall 2002)

ANALYTE	RESULTS (ppm)
Perfluorooctanesulfonate (PFOS)	0.169
Perfluorooctanoate (PFOA)	0.224
Perfluorohexanesulfonate (PFHS)	0.028
N-ethyl perfluorooctanesulfonamidoacetate (PFOSAA)	0.008
N-methyl perfluorooctanesulfonamidoacetate (M570)	0.007

WORKER #2

ANALYTE	RESULTS (ppm)		
	Nov. 1998 Sample	March 2000 Sample [2002 reanalysis]	June 2002 Sample
Perfluorooctanesulfonate (PFOS)	0.091	0.161 [0.142]	0.090
Perfluorooctanoate (PFOA)	0.022	0.082 [0.067]	0.025
Perfluorohexanesulfonate (PFHS)	0.013	0.018 [0.015]	0.009
N-ethyl perfluorooctanesulfonamidoacetate (PFOSAA)	Below LLOQ	0.020 [0.015]	Below LLOQ (0.004)
N-methyl perfluorooctanesulfonamidoacetate (M570)	0.006	0.057 [0.054]	Below LLOQ (0.057)
Perfluorooctanesulfonamide (PFOSA)	Below LLOQ	Below LLOQ (0.001) [n/a]	n/a
Perfluorooctanesulfonamido acetate (M556)	Below LLOQ	0.012 [n/a]	n/a

3M does not believe that these data meet the TSCA Section 8(e) "substantial risk" reporting threshold. In our view, these data are limited and provide no basis to draw any scientific conclusions. Nevertheless, 3M has decided to submit these data to the 8(e) docket, with the consent of the two workers, recognizing the ongoing work by U.S. EPA to assess fluorocchemical exposure pathways and potential risks.

If you have any questions, please do not hesitate to contact Dr. Larry Zobel at (651) 733-5181.
Sincerely,

Larry R. Zobel, MD MPH
Staff Vice President
and Medical Director
3M Medical Department